

**IN THE UNITED STATES DISTRICT COURT  
FOR THE SOUTHERN DISTRICT OF TEXAS  
BROWNSVILLE DIVISION**

B.X., a minor,

Petitioner/Plaintiff,

V.

JONATHAN HAYES, in his official capacity as Interim Director of the Office of Refugee Resettlement, and SERVANDO BARRERA, in his official capacity as Federal Field Specialist, Office of Refugee Resettlement,

Respondent/Defendant.

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CIVIL ACTION NO. 1:19-cv-00017

PETITIONER B.X.'s TRAVERSE

Comes now Petitioner B.X., who, by and through the below, his attorney of record, pursuant to 28 USC § 2248, who does hereby set out herein his traverse in response to the allegations set out in Federal Respondents' Memorandum In Opposition To Petitioner's Emergency Motion For Temporary Restraining Order And Preliminary Injunction And Federal Respondents' Motion To Dismiss Petitioner's First Amended Petition For Writ Of Habeas Corpus And Complaint For Declaratory And Injunction Relief, and exhibits attached thereto, in the following particulars:

1. Petitioner and the undersigned object to the characterization of Petitioner's attorney as not respecting his or his parent's wishes with respect to the matters involving Petitioner's best interests, and denies that such is true;

2. Petitioner and the undersigned deny that counsel ever insisted or otherwise stated to Petitioner's parents that his parents should not contact or speak to Respondents or their agents.
3. Petitioner and the undersigned deny that his parents' wishes have been other than as set out in their sworn-to declarations regarding counsel's authority, and the designation of the Sewell's as his sponsor.
4. Petitioner and undersigned deny that counsel ever represented to Respondents or their agents that Holly Sewell or her family were related to Petitioner or Petitioner's parents.

WHEREFORE, premises considered, Petitioner prays for this court to accept their filing as the traverse required under 28 USC § 2248.

Dated: March 25, 2019

Respectfully submitted,



**DE ANDA LAW FIRM, PC**

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Texas Bar No. 05689500

I declare under penalty of perjury that the foregoing is true and correct based on my personal knowledge. Executed in Laredo, Webb County, Texas, on this the 23 day of March 2019.

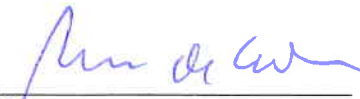
  
Ricardo de Anda

**CERTIFICATE OF SERVICE**

I, Ricardo de Anda, did serve the foregoing on E. Paxton Warner, Assistant United States Attorney for the Southern District of Texas, by emailing him a copy of same at:

Paxton.Warner@usdoj.gov

on this the 23 day of March 2019.

  
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Ricardo de Anda